



Multicultural Media, Telecom
& Internet Council

1919 Pennsylvania Avenue N.W. Suite 725
Washington, D.C. 20006

Phone: 202-332-0500 Fax: 202-332-7511
www.mmtconline.org

April 3, 2020

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Unlicensed Use of the 6 GHz Band, ET Docket No. 18-295

Dear Ms. Dortch:

The Multicultural Media, Telecom and Internet Council (MMTC) respectfully submits this letter to express our support for the Commission's proposed plan to open the 6 GHz band for unlicensed use, which would provide 1200 MHz of additional bandwidth to accommodate rapidly increasing Wi-Fi demand, as well as next-generation Wi-Fi innovation.

The COVID-19 pandemic has shined a harsh light on the impact that disparity in access has on lower-income and minority groups who are on the wrong side of the digital divide. As we all adapt to new realities – families must now educate their children at home; adults who can, must work from home; and those who cannot work from home are unable to work at all – the perils of those on the wrong side of the digital divide can no longer be ignored. The pandemic has brought to the forefront the harsh realities that lack of access to broadband has on the most vulnerable of our communities.

We strongly encourage the FCC to take all necessary actions to ensure that all Americans benefit from this reallocation of spectrum. We also applaud the FCC's earlier step of temporarily releasing a portion of the 5.9 GHz band for unlicensed use by fixed-wireless ISPs. In supporting the generous full allocation of the 6 GHz 'Goldilocks' band for unlicensed use, we hope the FCC's move will further MMTC's and the FCC's shared goal of closing the digital divide. It is imperative that every effort be made to do so.

More Unlicensed Spectrum Connects Our Communities

MMTC is committed to bridging the digital divide, and with millions of families forced to learn and work from home, an internet connection at an affordable price point for our communities is key. Already there is a digital divide where a significant proportion of America – one that is disproportionately low-income and minority – does not have broadband access at home, or relies on their devices to connect via cellular networks. With wireless network congestion and a lack of home broadband connections, and particularly now with COVID-19-related restrictions, these communities are at a marked disadvantage. Children who must transition to an online learning environment will fall behind. Adults who have lost their jobs will be unable to access online opportunities for reskilling. Elderly people who cannot physically visit their families will be unable to connect online.

The FCC is in a position where it can ensure individuals and families have access to the tools they need by opening up more spectrum for unlicensed use, which will help ease congestion on wireless networks and provide more capacity for Wi-Fi networks. Further, more unlicensed spectrum will support and lead to expansion of efforts by many wireline and wireless companies, retailers, restaurants, and many others that offer free public Wi-Fi access at various locations and hotspots across the nation. The move also will support next-generation Wi-Fi, which will open up additional opportunities for expansion and innovation that can further benefit underserved communities.

More Unlicensed Spectrum Supports Data Offloading

With the surge in wired network use, it is becoming clear that full use of the band for unlicensed purposes is increasingly important for data offloading. As Cisco's Visual Networking Index (VNI) report has revealed, mobile offloading has exceeded cellular traffic since 2016.¹ For the last few years, 67 percent of the total mobile traffic generated was offloaded to unlicensed bands through Wi-Fi, and Cisco predicts that number will increase to 76 percent by 2022.² This trend will likely accelerate due to the current shift in the remote work and e-learning environment.

Service providers and their customers rely on Wi-Fi networks to support broadband internet access when wireless networks are congested or unavailable, and government and industry prioritization of unlicensed spectrum allocation and use is paramount to support data offloading.

More Unlicensed Spectrum Supports Next-Generation Wi-Fi

The wired and wireless internet landscape continues to evolve to meet the exponential increases in demand for capacity and throughput, which has led to the latest-generation Wireless LAN standard, Wi-Fi 6. Beyond faster throughput, the next generations of Wi-Fi promise to improve coverage, boost video streaming capabilities, and provide better battery life. They also will enable new applications that can benefit rural, low-income, elderly, minority, and other underserved communities in many areas, such as telehealth, precision agriculture, artificial intelligence, and augmented and virtual reality. These benefits will further extend to small businesses, schools, libraries, and other users, improving quality of life and our nation's economy.

The FCC can ensure that Wi-Fi 6 will work at its full potential if more 160 MHz-wide contiguous channels are available. The current configuration of unlicensed spectrum, in the ISM and UNII bands, is not enough to support Wi-Fi 6. By opening all 1200 MHz for unlicensed use, the Commission would enable Wi-Fi 6 to operate on 7 channels that can help enable easy deployment of future generations of Wi-Fi on this band, as well as provide the offload capacity necessary to support 5G.

¹ See Cisco press statement "Cisco Mobile Visual Networking Index (VNI) Forecast Projects 7-Fold Increase in Global Mobile Data Traffic from 2016-2021" (February 7, 2017), citing Cisco Visual Networking Index™ (VNI) Global Mobile Data Traffic Forecast (2016 to 2021) report, stating that "In 2016, monthly offload traffic (10.7 EB) exceeded monthly mobile/cellular traffic (7.2 EB)." Article available at <https://newsroom.cisco.com/press-release-content?articleId=1819296> (last visited April 2, 2020).

² See "Cisco Visual Networking Index (VNI) Global and Americas/EMEAR Mobile Data Traffic Forecast, 2017–2022, Cisco Knowledge Network (CKN) Session" presentation (March 2019) by Thomas Burnett, Jr., Director, SP Thought Leadership, Cisco; Shruti Jain, Senior Analyst, Cisco; Usha Andra, Senior Analyst, Cisco; and Taru Khurana, Senior Analyst, Cisco. Available at https://www.cisco.com/c/dam/m/en_us/network-intelligence/service-provider/digital-transformation/knowledge-network-webinars/pdfs/190320-mobility-ckn.pdf (last visited April 2, 2020).

The FCC Is Well-Positioned to Protect Incumbent Users

In our support of the Commission's plan to open the 6 GHz band for full unlicensed use, MMTC also recognizes the importance of protecting incumbent users such as broadcasters broadcasting live news feeds from harmful interference. We therefore also express our support of the request made by Reps. Anna Eshoo, Tony Cárdenas, and G. K. Butterfield to protect incumbent users.³ We believe that the Commission is well-positioned to ensure that full unlicensed use of this spectrum does not harm the operation of those incumbents through innovative spectrum-sharing technologies like those already being used in other bands.

The Commission is in a position to stimulate and accelerate Wi-Fi innovation and broadband access to millions of underserved individuals and families, as well as to small businesses, schools, and other groups that will benefit economically from access to high-speed, high-capacity Wi-Fi. If past is prologue, communities of color in particular will benefit from the availability of next-generation Wi-Fi as they will be some of the first to adopt these new exciting services and applications.

MMTC therefore encourages the Commission to move forward with opening up the full 1200 MHz of bandwidth in the 6 GHz band for unlicensed use.

Pursuant to section 1.206(b) of the Commission's rules, this letter is being filed electronically.

Respectfully submitted,

Maurita Coley
President and CEO
Multicultural Media, Telecom and Internet
Council (MMTC)

Deborah Lathen
Policy Committee Co-Chair
MMTC Board of Directors

Rikin Thakker, Ph.D.
Vice President of Telecom and Spectrum Policy
MMTC

Marcella Gadson
Director of Communications and Policy Research
MMTC

cc: Office of Chairman Ajit Pai
cc: Office of Commissioner Brendan Carr
cc: Office of Commissioner Michael O'Rielly
cc: Office of Commissioner Jessica Rosenworcel
cc: Office of Commissioner Geoffrey Starks

³ See Rep. Eshoo, Cárdenas, and Butterfield Letter to Chairman Pai (March 4, 2020), available at <http://wififorward.org/wp-content/uploads/2020/03/Reps.-Eshoo-Cardenas-Butterfield-6-GHz-Letter.pdf> (last visited April 2, 2020).